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Attorneys for Defendants
USA Happy Baby Inc. & Michael Wei Yueh Liu

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

USA HAPPY BABY INC., MICHAEL
WEI YUEH LIU, AND JING DONG,

Defendants.

CASE NO. 5:19-cr-00027-PSG

**NOTICE OF MOTION AND MOTION
TO COMPEL TRANSLATION UNDER
*BRADY V. MARYLAND***

Filed Concurrently:

- 1) Memorandum of Points & Authorities;
- 2) Declaration of Kevin J. Cole; and
- 3) [Proposed] Order

Judge: Hon. Philip S. Gutierrez
Courtroom: 6A, 6th Floor

Hearing Date: January 26, 2024
Hearing Time: 10:00 a.m.

Action Filed: January 30, 2019
Trial Date: September 12, 2024

1 **TO THE HONORABLE COURT, ALL PARTIES, AND THEIR**
2 **ATTORNEYS OF RECORD:**

3 **PLEASE TAKE NOTICE** that on January 26, 2024, at 10:00 a.m., or as soon
4 thereafter as counsel may be heard, Defendants USA Happy Baby Inc. and Michael Wei
5 Yueh Liu will move, pursuant to *Brady v. Maryland*, to compel the government to translate
6 the documents which the government seized from Defendants but which remain
7 untranslated from Mandarin to English.

8 This Motion is based on the accompanying Memorandum of Points and Authorities,
9 the record in this matter, and any supplemental documents, materials, or testimony to be
10 provided to the Court.

11
12 DATED: December 28, 2023

Respectfully submitted,

13 **KJC LAW GROUP, A.P.C.**

14
15 By: /s/ Kevin J. Cole

16 Attorneys for Defendant
17 *USA Happy Baby Inc. & Michael Wei*
18 *Yueh Liu*